

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

CITY OF NEWARK,

Plaintiff,

v.

GEO RE-ENTRY GROUP, LLC; ABC CORP (A
FICTITIOUS COMPANY) 1-100,

Defendant(s).

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CIVIL CASE NO.:
2:25-cv-2225-JKS-LDW

**DECLARATION OF DIRECTOR
KETLEN ALSBROOK**

I, Ketlen Alsbrook, of full age, being duly sworn, according to law, hereby certify and say:

1. I am the Director of the City of Newark Department of Health and Community Wellness in the State of New Jersey.

2. I make this Certification in support of the City of Newark's Motion for Temporary Restraints and Injunctive Relief.

3. On March 31, 2025, I arrived at the Delaney Hall Detention Facility, located at 451 Doremus Avenue, Newark, New Jersey 017105, around 9:25 a.m. with Marsha McGowan, a Health Officer of the City of Newark Department of Health and Community Wellness.

4. Upon arrival, we tried to gain entry into the facility but were denied entry by security and the Assistant Warden Luis Soto.

5. We observed and/or suspect various violations and hazards that are of grave concern.

6. The staff failed to allow the Fire Department to conduct an elevator recall test, which presents an immediate danger to occupants in the event of a fire. (See NJ Uniform Fire Code, N.J.A.C. 5:70).

7. The facility had contractors perform electrical work without a permit, which creates a serious risk of fire or electrocution. (See N.J.A.C. 5:23-2.14, requiring permits before electrical work).

8. The facility was operating without a Certificate of Occupancy (CO). It appears that training is being conducted in an unapproved space, which is a potential violation of local zoning and construction codes.

9. I have good reasons to believe from the media's account of what is described to be at the facility and my observations and communications with the owner's representative during our visit today that the facility is being constructed to house long-term detainees, which will require the provision of food. Serving food without an appropriate health inspection in violation of state and municipal health codes, creates a risk of contamination and public health hazards.

10. The New Jersey Department of Health (NJDOH) and local health authorities inspect retail food establishments as often as deemed necessary, with a focus on food safety and compliance with N.J.A.C. 8:24 and can issue unsatisfactory ratings for establishments with violations that pose an imminent health hazard.

11. The local health authority must inspect every retail food establishment as often as it deems necessary, with a minimum of one unannounced complete inspection per year.

12. Inspections can also be conducted as part of foodborne illness investigations.

13. It is important that the Health Department inspects food establishments to prevent food borne illnesses that are detrimental to the health of the public such as:

- a. Salmonella: causes gastrointestinal symptoms such as diarrhea, nausea and vomiting;
- b. Escherichia coli (E.coli);

c. Can cause severe gastrointestinal illness, including bloody diarrhea and kidney failure; and

d. Clostridium Botulinum: Produces a toxin that can cause paralysis.


14. The purpose of inspections of food establishments is to safeguard the public health by ensuring food safety and preventing foodborne illnesses, focusing on practices like proper food handling, temperature control, and sanitation, as outlined in the New Jersey Sanitary Code.

15. Therefore, the denial of entry into the facility poses a potential risks to safety and an immediate danger to employees, detainees, and visitors.

16. In addition to the above, it is critical for the Health Department to review the facility's Infection Control policies to ensure appropriate measures are in place to prevent the spread of communicable diseases.

I declare under penalty of perjury that I have read the foregoing and that it is true and correct to the best of my knowledge.

Dated: 4/11/25



Ketlen Alsbrook, Director
Department of Health & Community Wellness
City of Newark